

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

	X	
ARLENE CANNON and on behalf	:	
of her minor daughter	:	Civil Action No.: 02-3657
KARA CANNON,	:	
	:	
Plaintiff,	:	The Honorable James McGirr Kelly
	:	
v.	:	
	:	
NATIONAL RAILROAD PASSENGER	:	
CORPORATION (Amtrak),	:	
	:	
Defendant.	:	
	X	

**UNOPPOSED MOTION TO EXTEND DISCOVERY BRIEFLY  
UNTIL JUNE 30, 2003  
IN ORDER TO DEPOSE PLAINTIFF, ARLENE CANNON**

Defendant National Railroad Passenger Corporation (“Amtrak”), through undersigned counsel, respectfully moves this Court to extend the existing discovery deadline until June 30, 2003 in order to complete the deposition of plaintiff, Arlene Cannon.

The grounds for this motion are as follows:

1. On April 4, 2003, defendant filed a Motion for Judgment on the Pleadings or, Alternatively, for Summary Judgment seeking dismissal of plaintiff's claims in their entirety. That motion has been fully briefed and the parties are awaiting a decision on that motion.
2. If defendant's motion is granted, there would be no need to subject plaintiff, Arlene Cannon, to a deposition. Plaintiff is the mother of a severely handicapped child, who would have to travel from her home in Virginia Beach, Virginia to the offices of defendant's counsel for the deposition.

3. Based on the representations of plaintiff's counsel, Barry Weintraub, Esq., all fact witnesses have been identified in this matter. Accordingly, Amtrak has decided not to take any depositions other than plaintiff.

4. Good cause therefore exists for an extension of the deadline. Plaintiff's counsel has advised that they consent to the proposed extension and thus have no opposition to this motion. This is the first request for an extension of time by defendant in this case.

5. For these reasons, defendant respectfully requests that the Court grant this motion and order that the discovery deadline be extended briefly until June 30, 2003 in order to complete the deposition of plaintiff, Arlene Cannon, and that the pre-trial deadlines be adjusted accordingly.

6. A proposed Order accompanies this motion.

Respectfully submitted,

LANDMAN CORSI BALLAINE & FORD P.C.  
Attorneys for Defendant  
National Railroad Passenger Corporation  
("Amtrak")

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Dated: May 21, 2003

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of defendants' Unopposed Motion to extend the discovery deadline until June 30, 2003 was served via fax and first class mail this 21st day of May, 2003 on the following:

Anthony Brady, Jr., Esq.  
Parkade Building  
519 Federal Building  
Suite 202  
Camden, NJ 08101

Barry Weintraub, Esq.  
32 Hayes Street  
Stafford, VA 22556

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Raquel M. Fruchter

Dated: May 21, 2003